	·	
1	JOSEPH A. WALSH II, CASB NO 143694	
2	joe.walsh@kyl.com GORDON YOUNG, CASB NO 158100	
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4	CHRISTOPHER A. STECHER, CASB No. 21532 chris.stecher@kyl.com	99
5	KEESAL, YOUNG & LOGAN A Professional Corporation	
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7	San Francisco, California 94133 Telephone: (415) 398-6000	
	Facsimile: (415) 981-0136	
8	Attorneys for Plaintiffs REGAL STONE LIMITED	
9	and FLEET MANAGEMENT LTD.	
10		
11	UNITED STATES	DISTRICT COURT
12	NORTHERN DISTR	ICT OF CALIFORNIA
13		
14		Case No. C 07-5800 SC
15	CHELSEA, LLC, MARK RUSSO, and ALLEN LORETZ, individually and on behalf	And related cases:
16	of all others similarly situated	07-6045 SC, 08-2268 SC, 08-2052 SC,
17	Plaintiff(s),	08-5098 SC, 09-01469 SC
18	Vs.	JOINT STIPULATION TO POSTPONE CASE MANAGEMENT CONFERENCE AND
19	REGAL STONE LIMITED, HANJIN SHIPPING CO., LTD., SYNERGY MARITIME,	[PROPOSED] ORDER
20	LTD., FLEET MANAGEMENT LTD., and JOHN COTA IN PERSONAM, M/V COSCO	
21	BUSAN IN REM	
22	Defendants.	
23		
24		
25		
26	This Joint Stimulation to Continue the Con-	Management Conference is filed in the law of
27	-	Management Conference is filed jointly by all
28	parties in the above listed cases pursuant to this Co	ourl's instruction.
20		
1	I	KYL_SF478926

Pursuant to guidance from the Court, all the parties by and through their counsel herein in the following related cases, HEREBY STIPULATE AND AGREE:

Chelsea, LLC et al. v. Regal Stone, Limited, et al., Case No. C-07-5800

U.S. et al. v. M/V Cosco Busan, et al., Case No. 07-06045

Continental Insurance Co., et al. v. Cota, et al., Case No. 08-02052

People of the State of California v. Regal Stone, Ltd. et al., Case No. 08-02268

Regal Stone, et al. v. Cota, et al., Case No. 08-05098

People of the State of California ex rel. Department of Fish and Game et al. v. Regal Stone

Ltd. et al., Case No. 09-01469

- 1. A plea has been entered by defendant John Cota in the pending criminal case related to the November 7, 2007 allision and resulting oil spill involving the M/V COSCO BUSAN, <u>U.S. v.</u>

 Cota, et al., Case No, CR 08-0160-1 SI-2, with sentencing set for June 2009. Trial of defendant Fleet Management Ltd. in the criminal case presently is set for mid-September 2009. In view of the still pending criminal case, the parties stipulate and agree that the May 1, 2009 Case Management Conference scheduled by this Court shall be continued until September 25, 2009. In addition, the parties agree that by September 18, 2009, the parties shall submit a Consolidated Joint Case Management Conference Statement ("Joint CMC Statement"). This Joint CMC Statement shall be a single document and include all of the related actions.
- 2. The parties further stipulate and agree that the stay currently in effect for all the related civil actions pending before this Court (Case Nos. C-07-5800, 07-05926, 07-06045, 08-02052, 08-02268, 08-05098, 09-01469) shall be continued through the proposed September 25th Case Management Conference, at which time the parties and the Court can evaluate the status of the criminal case, if any remains pending, at that time.

IT IS SO STIPULATED AND AGREED.

[SIGNATURES CONTINUED ON NEXT PAGE]

1	Chelsea, LLC et al. v. Regal Stone, Limit	ted. et al., Case No. C-07-5800
2		<u> </u>
3		
4	DATED: April 28, 2009	/s/ William M. Audet WILLIAM M. AUDET
5		ADEL NADJI
6		AUDET & PARTNERS, LLP Attorney for Plaintiffs
7		CHELSEA, LLC, MARK RUSSO and ALLEN LORETZ
8		
9		
10	DATED: April 28, 2009	/s/ Joseph A. Walsh II
11		JOSEPH A. WALSH II KEESAL, YOUNG & LOGAN
12		Attorneys for Defendants REGAL STONE LIMITED, FLEET
13		MANAGEMENT LTD., M/V COSCO BUSAN, and SYNERGY MARITIME LTD.
14		· · · · · · · · · · · · · · · · · · ·
15	DATED: April 28, 2009	/s/ Erich Paul Wise ERICH PAUL WISE
16		FYLNN, DELICH & WISE
17		Attorneys for Defendant HANJIN SHIPPING CO.
18		
19	[SIGNATURES CONTIN	HIED ON NEXT PAGEI
20	[SIGIVIT CRED CONTIN	OLD ON NEXT FACE
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1	U.S. et al. v. M/V Cosco Busan, et al., Case No. 07-0	<u>6045</u>
2		· ·
3		
4		R. Michael Underhill
5 6	BI	MICHAEL UNDERHILL RADLEY ROBERT O'BRIEN S. DEPARTMENT OF JUSTICE
7	At	torney for Plaintiff, Counter-Defendant and ird Party Plaintiff UNITED STATES OF
8	Ai	MERICA
9		
10	JC	Joseph A. Walsh II SEPH A. WALSH II EESAL, YOUNG & LOGAN
11	At	torneys for Defendant M/V COSCO BUSAN d Defendants and Counter-Claimants REGAL
12	ST	ONE LIMITED and FLEET MANAGEMENT D.
13		~ '
14		
15	DATED: April 28, 2009 /s/	Walter Gerard Coppenrath, Jr.
16	$\overline{\mathbf{W}}$	ALTER GERARD COPPENRATH, JR. DPPENRATH & ASSOCIATES
17		torneys for Defendant JOHN COTA
18		
19		
20		*
21		Sonja Marie Dahl NJA MARIE DAHL
22	DO	ONNELLY NELSON DEPOLO & URRAY
23	At	torney for Third-Party Defendant IARLES CALZA
24		The second of th
25	[SIGNATURES CONTINUE	ED ON NEXT PAGE]
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28	- 4 -	VVI CE470004
	JOINT STIPULATION TO CONTINUE CASE MANAGEMENT	KYL_SF478926 CONFERENCE- Case No. C 07-5800 SC

1	Continental Insurance Co., et al. v. Cota, et al., Cas	se No. 08-02052
2		
3		
4	DATED: April 28, 2009 /s	s/ Samuel Harold Ruby
5	\overline{S}	AMUEL HAROLD RUBY EVIN KIN-MAN HO
6	В	ULLIVANT HOUSER BAILEY, PC
7	C	attorneys for Plaintiff/Counter-Defendant CONTINENTAL INSURANCE COMPANY
8		
9		S/ Steven Crane TEVEN CRANE
10	 }	ERKES CRANE ROBINSON & SEAL LLP attorneys for Plaintiff/Counter-Defendant
11		ONTINENTAL INSURANCE COMPANY
12		
13	DATED: April 28, 2009 /s	Julia Ann Molander ULIA ANN MOLANDER
14		NDREW KING EDGWICK, DETERT, MORAN & ARNOLD,
15	\overline{A}	LP .ttorneys for Plaintiff-In-Intervention
16	R	LI INSURANCE COMPANY
17	·	
18		
19	$\overline{\mathbf{J}}$	Joseph A. Walsh II OSEPH A. WALSH II
20	A	EESAL, YOUNG & LOGAN Attorneys for Defendant M/V COSCO BUSAN
21	[] P.	nd Defendants/Counter-Claimants/Third-Party laintiffs REGAL STONE LIMITED and FLEET
22		IANAGEMENT LTD.
23		
24 25		•
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27		
28	[SIGNATURES CONTINU	ED ON NEXT PAGE]
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•	1100111 OIL OLIVITOR TO CONTINUE CASE MANAGEMEN	12 OOT11 DIGDITOH - CASC 110. C 07-3000 SC

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1	Case 3:07-cv-05800-SC Doc	cument 169 Filed 04/29/09 Page 6 of 10
		•
	TED: April 28, 2009	/s/ David Schack DAVID SCHACK
		LUKE ANDERSON K&L GATES LLP
		Attorneys For Cross-Defendant JOHN COTA
		*
Ш	ΓED: April 28, 2009	/s/ Randy Scott Erlewine RANDY SCOTT ERLEWINE
		PHILLIPS & ERLEWINE LLP Attorneys for Third Party Defendants THE SAN FRANCISCO BAR PILOTS and The
		SAN FRANCISCO BAR PILOTS
		BENEVOLENT & PROTECTIVE ASSOCIATION
	[SIGNATURES	S CONTINUED ON NEXT PAGE]
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1072	TE CONTINUE ANY ON THE CONTINUE OF THE	- 6 - KYL_SF47892 MANAGEMENT CONFERENCE- Case No. C 07-5800 SC

1	People of the State of California v. Regal Stone, Ltd. et al., Case No. 08-02268
2	
3	
4	DATED: April 28, 2009 /s/ Jeffrey Richard Vincent JEFFREY RICHARD VINCENT
5	JUDITH JOYCE LOACH OFFICE OF THE ATTORNEY GENERAL OF
6	THE STATE OF CALIFORNIA Attorneys for Counter-Defendant State of
7	California, acting by and through the Board of Pilot Commissioners
8	
9	
10	DATED: April 28, 2009 /s/ Bruce A. Behrens BRUCE A. BEHRENS
11	DAVID GOSSAGE KARL SCHMIT
12	WM. DAVID SULLIVAN PATRICK PETERSON
13	Attorneys for Plaintiff and Counter-Defendant PEOPLE OF THE STATE OF CALIFORNIA
15	acting by and through the Department of Transportation
16	
17	
18	DATED: April 28, 2009 /s/ Joseph A. Walsh II
19	JOSEPH A. WALSH II KEESAL, YOUNG & LOGAN
20	Attorneys for Defendant/Counter-Claimant REGAL STONE LIMITED and Defendant M/V
21	COSCO BUSAN
22	
23	[SIGNATURES CONTINUED ON NEXT PAGE]
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		·•
1	Regal Stone, et al. v. Cota, et al., Cas	se No. 08-05098
2		
3		
4	DATED: April 28, 2009	/s/ Joseph A. Walsh II JOSEPH A. WALSH II
5	·	KEESAL, YOUNG & LOGAN Attorneys for Plaintiff
6		REGAL STONE LIMITED and FLEET MANAGEMENT LTD.
7		MATAGEMENT BID.
8	DATED: April 28, 2009	/s/ Ryan Donlon
9		RYAN DONLON FORREST BOOTH
10		RANDY SCOTT ERLEWINE SEVERSON & WERSON
11		Attorneys for Defendants SAN FRANCISCO BAR PILOT'S
12		ASSOCIATION, PETER MCISAAC, RUSSEL NYBORG, SAN FRANCISCO BAR PILOTS
13		
14		
15		
16	DATED: April 28, 2009	/s/ David Schack
17	•	DAVID SCHACK LUKE ANDERSON
18		K&L GATES LLP Attorneys For Defendant
19		JOHN ČOTA
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	JOINT STIPULATION TO CONTINUE CAS	- 8 - KYL_SF47892 E MANAGEMENT CONFERENCE- Case No. C 07-5800 SC

People of the State of California ex rel. Department of Fish and Game, et al. v. Re et al., Case No. 09-01469 DATED: April 28, 2009 /s/ Kevin Derek Lesh KEVIN DEREK LESH CALIFORNIA STATE ATTORN GENERAL'S OFFICE Attorneys for Plaintiffs PEOPLE OF THE STATE OF CA EX REL. DEPARTMENT OF FIS GAME, PEOPLE OF THE STAT CALIFORNIA EX REL., CALIFO REGIONAL WATER QUALITY BOARD, SAN FRANCISCO BA PEOPLE OF THE STATE OF CA REL., STATE LANDS COMMIS	egal Stone Ltd.,
2 det al., Case No. 09-01469 DATED: April 28, 2009 Solution Solution	egal Stone Ltd.,
DATED: April 28, 2009 /s/ Kevin Derek Lesh KEVIN DEREK LESH CALIFORNIA STATE ATTORN GENERAL'S OFFICE Attorneys for Plaintiffs PEOPLE OF THE STATE OF CA EX REL. DEPARTMENT OF FIS GAME, PEOPLE OF THE STAT CALIFORNIA EX REL., CALIFO REGIONAL WATER QUALITY BOARD, SAN FRANCISCO BA PEOPLE OF THE STATE OF CA	
DATED: April 28, 2009 /s/ Kevin Derek Lesh KEVIN DEREK LESH CALIFORNIA STATE ATTORN GENERAL'S OFFICE Attorneys for Plaintiffs PEOPLE OF THE STATE OF CA EX REL. DEPARTMENT OF FIS GAME, PEOPLE OF THE STAT CALIFORNIA EX REL., CALIFO REGIONAL WATER QUALITY BOARD, SAN FRANCISCO BA PEOPLE OF THE STATE OF CA	
KEVIN DEREK LESH CALIFORNIA STATE ATTORN GENERAL'S OFFICE Attorneys for Plaintiffs PEOPLE OF THE STATE OF CA EX REL. DEPARTMENT OF FIS GAME, PEOPLE OF THE STAT CALIFORNIA EX REL., CALIFO REGIONAL WATER QUALITY BOARD, SAN FRANCISCO BA PEOPLE OF THE STATE OF CA	
Attorneys for Plaintiffs PEOPLE OF THE STATE OF CA EX REL. DEPARTMENT OF FIS GAME, PEOPLE OF THE STAT CALIFORNIA EX REL., CALIFO REGIONAL WATER QUALITY BOARD, SAN FRANCISCO BA PEOPLE OF THE STATE OF CA	NEY
8 EX REL. DEPARTMENT OF FIS GAME, PEOPLE OF THE STAT CALIFORNIA EX REL., CALIFO REGIONAL WATER QUALITY BOARD, SAN FRANCISCO BA PEOPLE OF THE STATE OF CA	ALIFORNIA
REGIONAL WATER QUALITY BOARD, SAN FRANCISCO BA PEOPLE OF THE STATE OF CA	SH AND
PEOPLE OF THE STATE OF CA	CONTROL
	ALIFORNIA <i>EX</i>
12	
13 DATED: April 28, 2000	
DATED: April 28, 2009 /s/ Joseph A. Walsh II JOSEPH A. WALSH II KEESAL, YOUNG & LOGAN	
Attorneys for Defendants REGAL STONE LIMITED, FLL	
MANAGEMENT LTD., SYNER MANAGEMENT SERVICES, SY MARINE LTD.	.GY YNERGY
18	:
19 DATED: April 28, 2009 /s/ James Barton Nebel JAMES BARTON NEBEL	
ERICH PAUL WISE FLYNN DELICH & WISE, LLP	
Attorneys for Defendant HANJIN SHIPPING CO., LTD.	
23	
24	
DATED: April 28, 2009 /s/ Walter Gerard Coppenrath, Jr. WALTER GERARD COPPENRA	ATH, JR.
COPPENRATH & ASSOCIATES Attorneys for Defendant JOHN J. COTA	S
27	
28 - 9 - JOINT STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE- Case No. C 07-580	KYL_SF478926

<u>ORDER</u>

Based upon the foregoing Stipulation of the Parties, and good cause appearing therefore, IT IS SO ORDERED.

DATED: __April 29, 2009



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JOINT STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE- Case No. C 07-5800 SC